

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHERN DISTRICT**

**CYNTHIA K. HAYNES** )  
**(a/k/a Cynthia K. Randolph),** )  
**individually and under the Missouri Wrongful** )  
**Death Statute,** )

**Plaintiffs,** )

**v.** )

**Cause No. 1:21-CV-00160-SNL**

**JENNIFER WILLIAMS, individually** )

**JENNIFER WILLIAMS,** )  
**d/b/a WILLIAMS LAW** )

**JURY TRIAL DEMANDED**

**SPAIN, MILLER, GALLOWAY & LEE, LLC** )  
**A Missouri limited liability company,** )

**BERNICE HAYNES, individually and** )

**CHARLES HAYNES, individually** )

**Defendants.** )

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

COMES NOW Defendant Bernice Haynes, by counsel, and states to the Court as follows:

1. Defendant Bernice Haynes is an elderly woman living in New Jersey.
2. The undersigned was hired today to represent Defendant Bernice Haynes.
3. Defendant Bernice Haynes respectfully requests an extension of time to file a response to Plaintiff's Amended Complaint, up to and including, January 10, 2022.
4. The undersigned counsel has communicated with Plaintiff's counsel on this matter and Plaintiff's counsel has no objection to this extension.

WHEREFORE, Defendant Bernice Haynes prays for an extension of time to file a response to the Amended Complaint, up to and including January 10, 2022, and for such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

THE LIMBAUGH FIRM  
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By /s/ John C. Steffens

John C. Steffens - #63267

ATTORNEYS FOR DEFENDANT BERNICE  
HAYNES

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2021, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ John C. Steffens